

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In Re:

ANA T. FIGUEROA ROMAN
(XXX-XX-6908)

Debtor(s)

Case No.: 19-03969 BKT

Chapter 13

DEBTOR'S RESPONSE TO TRUSTEE'S UNFAVORABLE RECOMMENDATION (Doc. #.20)

TO THE HONRABLE COURT:

COMES NOW DEBTOR, by and through the undersigned attorney, very respectfully ALLEGES and PRAYS:

1. This case was filed on July 12th, 2019. The proposed Chapter 13 plan was filed along with the voluntary petition. The §341 Meeting of Creditors was held and closed on August 21st, 2019 (Doc.#9). Confirmation Hearing to consider debtor's proposed plan has been scheduled for January 30th, 2020 (Doc.#22).

2. On December 11, 2019 the Chapter 13 Trustee filed an Unfavorable Recommendation to the Plan (the "Unfavorable recommendation"), commenting various issues that needed be addressed by Debtor(s) prior to the possible confirmation of the Chapter 13 Plan. *See* Doc. 20.

3. By way of the present motion, Debtor is respectfully addressing all the findings, inquiries and requests made by the Trustee in the Unfavorable Recommendation. Accordingly, each finding with its respective corrective actions are summarized and explained as follows:

a. **Debtor is to provide the following:**

- Physical and postal address of Mr. Nomar Andre Torres Laboy (Transferee) or any contact information available.

Debtor's response to the finding/objection: On January 21st, 2020 Debtor submitted to the Trustee what she understands to be the Transferee's physical

and mailing address. This information was uploaded to the Trustee's system. *See* attachment.

4. With the present response Debtor has demonstrated that she has complied with all the pending requests made by the Trustee in his Unfavorable Report.

WHEREFORE, Debtor respectfully requests this Honorable Court to take notice of the above and consider Debtor in full compliance with all of Trustee's requests and clarifications included in his Unfavorable Report at Doc. 20.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification, upon information and belief, of such filing to the following: The Chapter 13 Trustee, The United States Trustee and to all the CM/ECF participants of this case.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico this **22nd** day of **JANUARY** 2020.

IGNACIO GARCIA FRANCO
USDC 231410
Attorney for debtor
PO Box 361844
San Juan, P.R. 00936
Tel (787) 478-3379
FAX (1-888) 860-9135
Email: ignaciolaw@gmail.com

/s/ Ignacio García Franco, Esq.

Welcome IGNACIO GARCIA FRANCO*

Show 10 entries

Search: 1903969

ID	Case Number	Uploaded Date	Original Name	Description	Status
105017	1903969	7/26/2019 4:15:24 PM	PANIncome_AnaTFigueroa.pdf	Income evidence (other than paystubs)-UDP	Complete
105018	1903969	7/26/2019 4:15:24 PM	DivorceResolution-AnaT.Figueroa.pdf	Letters General-UDP	Complete
105019	1903969	7/26/2019 4:15:27 PM	VehicleFinancecontract-AnaTFigueroa.pdf	Letters General-UDP	Complete
105020	1903969	7/26/2019 4:15:29 PM	WriteSaleofLot-AnaFigueroa.pdf	Letters General-UDP	Complete
109880	1903969	9/25/2019 12:25:39 PM	Appraisalreport2015_AnaT.Figueroa.pdf	Appraisals/Comparables/Value Opinion-UDP	Complete
115606	1903969	12/4/2019 9:50:12 AM	TitleStudyResidence.pdf	Title Search or Title Study-UDP	Complete
119127	1903969	1/21/2020 2:48:14 PM	CONTACTINFORMATIONOFTRANSFEEEOFPROPERTY.pdf	Letters General-UDP	Complete

Showing 11 to 17 of 17 entries (filtered from 957 total entries)

Previous 1 2 Next